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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20054

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of 73.202(b)) MM Docket No. 01-110
Table of Allotments) RM-9927
FM Broadcast Stations)
(**Newberry & Simpsonville, SC**))

To: Sharon P. Mc Donald
Allocations Branch
Mass Media Bureau

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COMMENTS AND COUNTERPROPOSAL

Pursuant to 47 CFR 1.415 and 1.420(d), Georgia-Carolina Radiocasting Company, LLC, ^{1/} licensee of station WGVC (FM), Newberry, SC, respectfully submits these Comments and Counterproposal in response to the NPRM, DA 01-1198, released May 11, 2001.

Petitioner initially proposed to amend the FM Table of Allotments by reallocating channel 292A from Newberry, SC to Simpsonville, SC, in order to provide a first local service to the latter community, and to modify the license of station WGVC (FM) accordingly.

However, during the year in which the Petition has been pending, the licensee's October 1999 "one-step" application to upgrade its channel 292A facility at Newberry to channel 292C3 at Newberry was granted (on April 18, 2001). See BMPH-991004ABS. ^{2/}

^{1/} The licensee informed the FCC by letter this date that its name has been changed from Upstate-Carolina Broadcasting Co., LLC to "**Georgia-Carolina Radiocasting Co., LLC**," effective immediately. There were no ownership changes.

^{2/} A license application for the C3 facility at Newberry was filed on June 7, 2001. See BLH-20010607ABC.

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Accordingly, Petitioner hereby proposes, as a Counterproposal to its Petition, to amend the FM Table of Allotments by reallocating channel 292C3 from Newberry, SC to Simpsonville, SC and modifying the license of WGVC (FM) accordingly. See Modification of FM and TV Authorizations to Specify a New Community of License, 4 FCC Rcd 4870 (1989), recon. granted in part, 5 FCC Rcd 7094 (1990).

Attached hereto is an engineering report, which contains a channel study confirming that channel 292C3 can be reallocated from Newberry, SC to Simpsonville, SC, consistent with the FCC's mileage separation rules. See Appendix A.

The proposed reallocation would result in significant public interest benefits. First, the reallocation of channel 292C3 from Newberry, SC, to Simpsonville, SC, would provide Simpsonville with its first local, aural transmission service. Simpsonville is one of the fastest growing incorporated cities in the entire state of South Carolina. ^{3/}

Second, the reallocation proposed in the Counterproposal would allow the licensee to substantially increase its service to the public. A grant of the proposed change of community for this C3 facility would yield an increase of over 400,000 persons in WGVC's service area. See Appendix A. Third, the requested reallocation also would ensure that the Class C3 broadcast facility serves the larger community. See Appendix A (Simpsonville's 1990

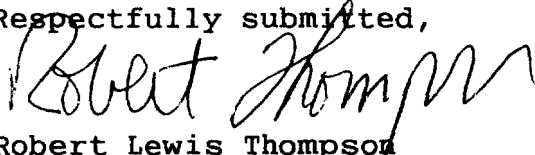
^{3/} Simpsonville's population grew 44 percent from 1990-1997 (see South Carolina Department of Commerce, 1997 estimate).

population of 11,708 is greater than Newberry's 1990 population of 10,539). ^{4/}

Thus, a grant of the Counterproposal would best serve statutory goals ^{5/} and would result in a preferential arrangement of FM allotments. See Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1992).

Finally, if channel 292C3 is reallocated to Simpsonville, SC, the Petitioner will apply for it and, if ultimately granted a CP, the Petitioner will promptly construct the FM facility.

Respectfully submitted,



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July 2, 2001

Counsel for Georgia-Carolina
Radiocasting Co., LLC

^{4/} See note 3, supra.

^{5/} See 47 USC 307(b).

Georgia-Carolina Radiocasting Company, LLC
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COMMENTS AND COUNTERPROPOSAL
Newberry and Simpsonville, South Carolina
MM Docket 01-110
July 2001

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STATE OF ARIZONA)
)
COUNTY OF MARICOPA) SS:

F. W. Hannel, after being duly sworn upon oath,
deposes and states:

He is a registered Professional Engineer, by
examination, in the State of Illinois;

He is a graduate Electrical Engineer, holding Bachelor
of Science and Master of Science degrees, both in Electrical
Engineering;

His qualifications are a matter of public record and
have been accepted in prior filings and appearances requiring
Scrutiny of his professional qualifications;

The attached Engineering Report was prepared by him
personally or under his supervision and direction and;

The facts stated herein are true, correct, and
complete to the best of his knowledge and belief.

July 1, 2001



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ENGINEERING STATEMENT

This firm has been retained by Georgia-Carolina Radiocasting Company, LLC¹, licensee of Radio Station WGVC(FM), Newberry, South Carolina to prepare this engineering statement in support of its Comments and Counterproposal in this proceeding which seeks to change the community of license for Radio Station WGVC(FM) from Newberry, South Carolina to Simpsonville, South Carolina as that community's first local aural service.

The Commission, in MM Docket 01-110 (Released May 11, 2001), has proposed to delete the presently assigned FM Channel 292A² at Newberry, South Carolina and to add FM Channel 292A at Simpsonville, South Carolina as that community's first local service. Since the filing of the original petition over 1 year ago, the applicant has found that the public interest would be better served by assigning FM Channel 292C3 to Simpsonville, South Carolina instead of FM Channel 292A as was requested³. Since WGVC(FM) has been upgraded to a class C3 facility, its relocation to Simpsonville as a higher class facility better serves the public interest than the assignment of FM Channel 292A.

The removal of FM Channel 292C3 from Newberry, South Carolina will not deprive that community of its only aural service as Radio Station WKDK(AM) and

¹ Since the filing of the original Rulemaking proposal, the applicant name has been changed from Upstate Carolina Broadcasting Company, LLC to Georgia-Carolina Radiocasting Company, LLC.

² During the pendency of this proceeding WGVC(FM) has been granted a one step upgrade to FM Channel 292C3 and a license application was accepted for filing on June 8, 2001, File No. BLH-20010607ABC. The Commission's FM Table of Allotments has not been changed to reflect this upgraded allotment at Newberry, South Carolina.

³ As was the case with the proposed allotment of FM Channel 292A, proposed allotment site for FM Channel 292C3 at Simpsonville does not penetrate over 50% of the Greenville, South Carolina Urbanized Area, therefore no *Tuck* analysis is being submitted.

WKMG(AM) are licensed to that community and would provide 2 aural services to Newberry, South Carolina, (1990 population of 10,539 persons). Simpsonville, on the other hand, has no aural service despite its substantial size, (1990 population of 11,708 persons, and a 2000 population of 14,352 persons). Simpsonville is obviously a growing community, with a population increase of 22.5 percent from 1990 to 2000 and is deserving of a first local aural service.

Simpsonville, South Carolina, (2000 population of 14,352 persons), is located in Greenville County, (1990 population of 287,895 persons) at US Atlas Co-ordinates N34-44-13, W82-15-16, and the reference site for the allotment of FM Channel 292C3 is N34-39-04, W82-07-12. This allotment site is 15.6 km, (9.76 miles), southeast of Simpsonville, and a transmitter operating from these co-ordinates fully complies with the Commission's city grade and mileage separation requirements. Attached as Exhibit E-1 is a channel study conducted from the allotment site co-ordinates which demonstrates that the allotment complies fully with the Commission's Requirements.

Attached as Exhibit E-2 is a map showing the population and area gain and loss for the assignment of FM Channel 292C3 from Newberry to Simpsonville. This map shows a population gain of 400,310⁴ persons inside the 60 dbu contour if channel 292C3 were made at Simpsonville. The present facility serves an area of 3058 sq. km with a population of 68,400 persons, and the proposed facility at Simpsonville provides service to 4778 sq. km containing a population of 468,800 persons. The net increase in population served by the Simpsonville allotment is 400,310 persons and the net area gained is 4286 sq. km. The loss area is 2566 sq. km containing a population of 68,490 persons⁵. Clearly the proposed assignment of FM Channel 292C3 to Simpsonville, South Carolina provides service to a substantially greater population than the assignment at Newberry, South Carolina.

⁴ All population figures are from the 1990 census.

⁵ The loss area receives service from a number of facilities and is well served.

In view of the foregoing, it is requested that the Commission amend the FM Table of Allotments as follows:

Community	Present	Proposed
Newberry, South Carolina	292C3 ⁶	----- ⁷
Simpsonville, South Carolina	-----	292C3

The changes proposed will provide a more efficient distribution of the aural services by providing Simpsonville, South Carolina with its first local service without depriving any community of a local aural service. Using the Commission's allotment criteria, the Simpsonville allotment would be favored as a priority 3 proposal while the present assignment at Newberry would be favored under priority 4⁸. Clearly the proposal to assign FM Channel 293C3 to Simpsonville results in a more favorable distribution of the aural services.

⁶ Channel 292C3 at Newberry was assigned through a one-step upgrade application. See File No. BLH-20010607ABC.

⁷ Newberry South Carolina continues to receive service from Radio Stations WKDK(AM) and WKMG(AM).

⁸ The FM allotment priorities are: (1) First full-time aural service; (2) Second full-time aural service; (3) First local service; and (4) Other public interest matters. [Co-equal weight given to priorities (2) and (3).

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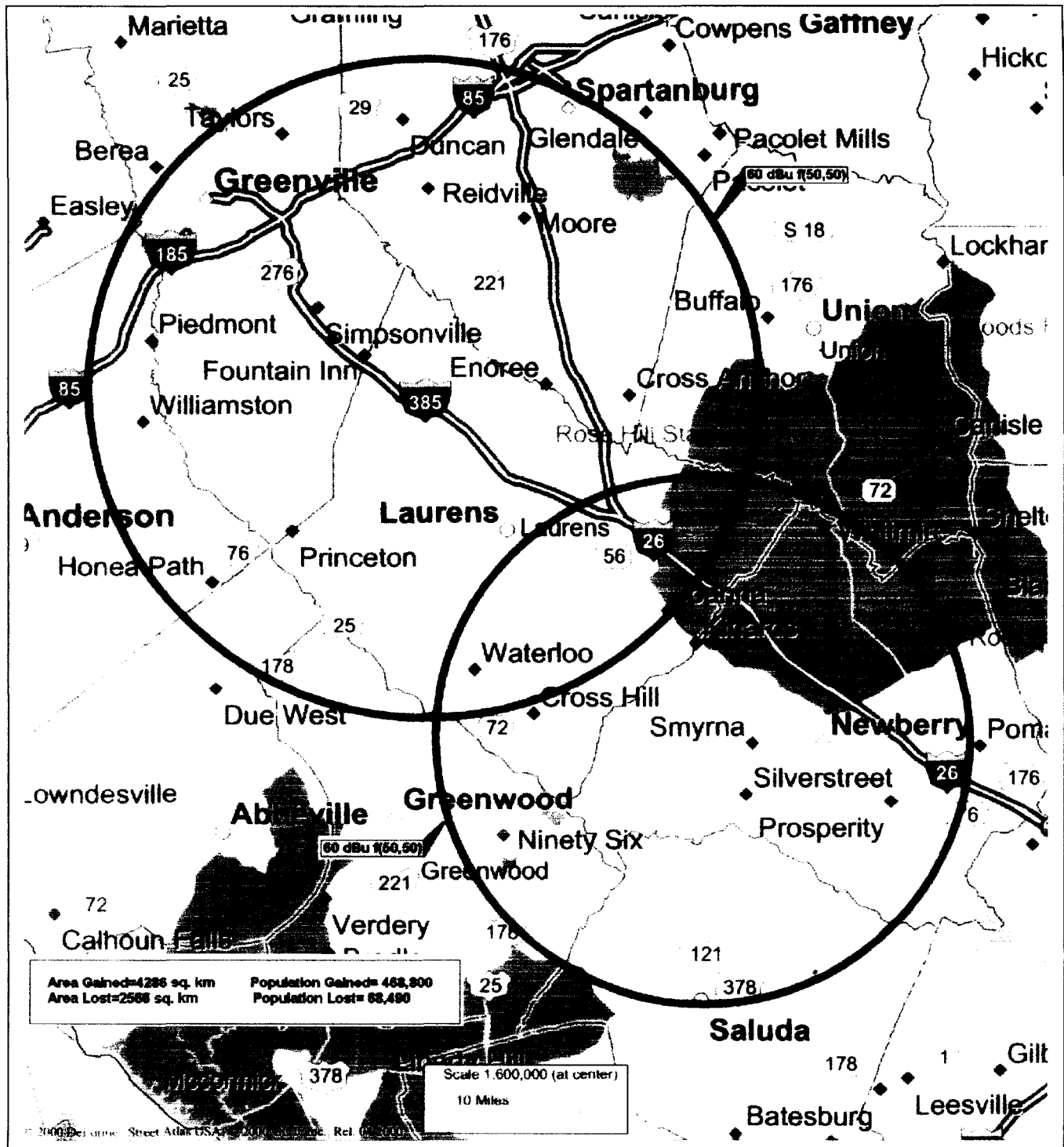
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FM Channel Study
FM Channel 292C3
Simpsonville, South Carolina
N34-39-04
W82-07-12

Exhibit E-1

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLR
WZNY	AUGUSTA	GA	289	C	U	136.0	96.0	173.4°	40.0
W290AE	LAURENS	SC	290	D	L	21.5	0.0	144.7°	21.5
ALC	TOCCOA	GA	291	C1	D	144.5	144.0	257.9°	0.5
ALC	SUGAR HILL	GA	291	C1	A	144.5	144.0	257.9°	0.5
ALC	LAWRENCEVILLE	GA	291	C1	A	144.5	144.0	257.9°	0.5
WNGC	TOCCOA	GA	291	C1	L	144.5	144.0	257.9°	0.5
WNGC	TOCCOA	GA	291	C1	A	147.3	144.0	250.5°	3.3
WNMX-F	WAXHAW	NC	291	C2	U	125.9	117.0	78.3°	8.9
WNMX-F	WAXHAW	NC	291	C2	L	124.1	117.0	78.0°	7.1
ALC	SIMPSONVILLE	SC	292	A		15.6	142.0	307.7°	-126.4
WGVC	NEWBERRY	SC	292	A	U	63.9	142.0	124.2°	-78.1
WGVC	NEWBERRY	SC	292	C3	V	48.4	153.0	147.5°	-104.6
WGVC	NEWBERRY	SC	292	C3	A	48.4	153.0	147.5°	-104.6
WGVC	NEWBERRY	SC	292	A	L	52.5	142.0	142.2°	-89.5
WEND	SALISBURY	NC	293	C1	U	180.2	144.0	48.1°	36.2
WEND	SALISBURY	NC	293	C1	L	171.4	144.0	52.5°	27.4
WMIT	BLACK MOUNTAIN	NC	295	C	U	121.2	96.0	352.8°	25.2
WMIT	BLACK MOUNTAIN	NC	295	C	L	121.2	96.0	352.8°	25.2
WMIT	BLACK MOUNTAIN	NC	295	C	L	121.2	96.0	352.8°	25.2

All Distances in Kilometers



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Exhibit E-2